

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ROBERT BARTLETT, et al.,

Plaintiffs,

-against-

SOCIETE GENERALE DE BANQUE AU LIBAN
SAL, et al.,

Defendants.

No. 19-cv-0007-CBA-TAM

**ANSWER AND AFFIRMATIVE
AND OTHER DEFENSES IN
RESPONSE TO THE SECOND
AMENDED COMPLAINT**

Defendant Société Générale de Banque au Liban S.A.L. (“SGBL” or “the Bank”) by its undersigned counsel, Ashcroft Law Firm, as for its Answer and Affirmative and Other Defenses to the Second Amended Complaint (the “SAC”), states as follows:

GENERAL DENIAL AND OBJECTION

SGBL denies any allegation in the SAC not expressly admitted herein. The Bank specifically denies that: (i) it is liable to any Plaintiff under the civil remedies provision of the Anti-Terrorism Act, 18 U.S.C. § 2333 (“ATA”); (ii) it committed an act of international terrorism that gave rise to Plaintiffs’ injuries; (iii) it factually or proximately caused such an act of international terrorism; (iv) it aided and abetted a person who committed such an act of international terrorism; or (v) it conspired with any person to commit such an act of international terrorism.

SGBL also objects to the SAC on several grounds. First, the SAC fails to follow Rules 8(a)(2) and 8(d)(1) of the Federal Rules of Civil Procedure, which require, *inter alia*, that “[e]ach allegation must be simple, concise, and direct.” Second, the SAC also asserts allegations regarding foreign financial services – including foreign accounts and wire transfers that

originated and/or were remitted in foreign jurisdictions – that the Bank is currently constrained from answering by foreign bank secrecy laws.¹

I. NATURE OF THE ACTION

1. In response to paragraph 1 of the SAC, SGBL admits this action is brought under the ATA and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

2. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 2 of the SAC.

3. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 3 of the SAC.

4. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 4 of the SAC.

5. SGBL denies the allegations in paragraph 5 of the SAC.

6. SGBL denies the allegations in paragraph 6 of the SAC.

7. SGBL denies the allegations in paragraph 7 of the SAC.

8. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 8 of the SAC regarding accounts allegedly held by it and otherwise

¹ “[C]riminal statutes governing bank secrecy in a number of foreign jurisdictions prohibit disclosing the [foreign financial information] sought by” plaintiffs. Br. for the United States as Amicus Curiae, *Arab Bank, PLC v. Linde, et al.*, No. 12-1485, 2014 WL 2191224, at *16-17 (S. Ct. May 23, 2014) (further noting that these statutes “reflect legitimate sovereign interests in protecting foreign citizens’ privacy and confidence in the nations’ financial institutions.”) (citations omitted) (emphasis supplied).

denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

9. SGBL denies the allegations in paragraph 9 of the SAC.

10. SGBL denies the allegations in paragraph 10 of the SAC.

11. SGBL denies the allegations in paragraph 11 of the SAC.

12. SGBL denies the allegations in paragraph 12 of the SAC.

II. HISTORICAL BACKGROUND

13. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 13 of the SAC.

14. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 14 of the SAC.

15. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 15 of the SAC.

16. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 16 of the SAC.

17. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 17 of the SAC.

18. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 18 of the SAC.

19. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 19 of the SAC.

20. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 20 of the SAC.

21. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 21 of the SAC.

22. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 22 of the SAC.

23. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 23 of the SAC.

24. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 24 of the SAC.

25. In response to paragraph 25 of the SAC, SGBL refers the Court to the referenced designation and publication for a full statement of their contents.

26. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 26 of the SAC.

27. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 27 of the SAC; and otherwise refers the Court to the referenced report for a full statement of its contents.

28. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 28 of the SAC.

29. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 29 of the SAC.

30. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 30 of the SAC.

31. In response to paragraph 31 of the SAC, SGBL refers the Court to the referenced designation and publication for a full statement of their contents.

32. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 32 of the SAC.

33. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 33 of the SAC.

34. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 34 of the SAC.

35. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 35 of the SAC.

36. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 36 of the SAC; and otherwise refers the Court to the referenced publication for a full statement of its contents.

37. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 37 of the SAC.

38. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 38 of the SAC; and otherwise refers the Court to the referenced publication for a full statement of its contents.

39. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 39 of the SAC.

40. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 40 of the SAC.

41. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 41 of the SAC.

42. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 42 of the SAC.

43. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 43 of the SAC.

44. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 44 of the SAC.

45. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 45 of the SAC.

46. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 46 of the SAC.

47. SGBL denies the allegations in paragraph 47 of the SAC.

III. THE STRUCTURE OF LEBANON'S ECONOMY

48. SGBL admits that Lebanon is a predominantly importing country and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 48 of the SAC.

49. In response to paragraph 49 of the SAC, SGBL refers the Court to the referenced July 2, 2009 Statement of the International Monetary Fund for its full content and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations in

paragraph 49 of the SAC particularly given the absence of any definition in the SAC as to the meaning Plaintiffs ascribe to the terms “historically”, “primarily” and “heavily weighted”.

50. In response to paragraph 50 of the SAC, SGBL refers the Court to any statements made by the Central Bank of Lebanon for their content.

51. SGBL denies the allegations in paragraph 51 of the SAC.

52. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 52 of the SAC.

53. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 53 of the SAC.

54. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 54 of the SAC.

55. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 55 of the SAC except refers to the alleged statement of the U.S. Department of the Treasury for its full content.

56. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 56 of the SAC.

57. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 57 of the SAC.

58. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 58 of the SAC.

59. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 59 of the SAC.

60. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 60 of the SAC.

61. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 61 of the SAC.

62. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 62 of the SAC.

63. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 63 of the SAC.

64. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 64 of the SAC.

65. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 65 of the SAC.

66. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 66 of the SAC.

67. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 67 of the SAC.

68. SGBL admits that it maintains correspondent banking relationships with U.S. financial institutions in New York; and otherwise denies the allegation in paragraph 68 of the SAC.

69. SGBL denies the allegations in paragraph 69 of the SAC.

70. SGBL denies the allegations in paragraph 70 of the SAC.

71. SGBL denies the allegations in paragraph 71 of the SAC.

72. SGBL denies the allegations in paragraph 72 of the SAC.

73. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 73 of the SAC; and otherwise refers the Court to the referenced article for a full statement of its contents.

74. SGBL denies the allegations in paragraph 74 of the SAC.

75. SGBL denies the allegations in paragraph 75 of the SAC.

76. SGBL denies the allegations in paragraph 76 of the SAC.

77. SGBL denies the allegations in paragraph 77 of the SAC.

78. SGBL admits that Lebanon is a member of the Middle East and North Africa Financial Action Task Force; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 78 of the SAC.

79. SGBL admits that the Special Investigation Commission is a financial intelligence unit empowered to investigate suspicious financial transactions and freeze assets; and otherwise denies the allegations in paragraph 79 of the SAC.

80. SGBL denies the allegations in paragraph 80 of the SAC.

81. SGBL denies the allegations in paragraph 81 of the SAC.

82. SGBL denies the allegations in paragraph 82 of the SAC.

83. SGBL denies the allegations in paragraph 83 of the SAC.

84. SGBL denies the allegations in paragraph 84 of the SAC.

85. SGBL denies the allegations in paragraph 85 of the SAC.

86. SGBL denies the allegations in paragraph 86 of the SAC.

IV. THE LEBANESE CANDIAN BANK INVESTIGATION

87. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 87 of the SAC.

88. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 88 of the SAC.

89. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 89 of the SAC.

90. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 90 of the SAC; and otherwise refers the Court to the referenced publication of any such alleged finding for its content.

91. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 91 of the SAC.

92. SGBL denies the allegations in the first sentence of paragraph 92 and denies knowledge or information sufficient to form a belief as to the truth of the allegations in the second sentence.

93. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 93 of the SAC; and otherwise refers the Court to the referenced complaint for its content.

94. SGBL refers the Court to the referenced complaint for its content and the referenced settlement agreement for its content.

95. SGBL denies the allegations in paragraph 95 of the SAC.

96. SGBL admits that it retained a “prominent international accounting firm” and a firm “founded by former U.S. Attorney General John Ashcroft” in connection with its acquisition of certain assets and liabilities of the Lebanese Canadian Bank pursuant to Lebanese law; and otherwise denies the allegations in paragraph 96 of the SAC.

97. SGBL refers the Court to the referenced publication for a full statement of its contents.

98. SGBL refers the Court to the referenced publication for a full statement of its contents.

99. SGBL states that to the extent paragraph 99 states an opinion, no response is required; and otherwise denies the allegations except refers the Court to the referenced publication for a full statement of its contents.

100. SGBL denies the allegations in paragraph 100 of the SAC; and otherwise refers the Court to the referenced publication for a full statement of its contents.

101. SGBL denies the allegations in paragraph 101 of the SAC; and otherwise refers the Court to the referenced publication for a full statement of its contents.

102. SGBL denies the allegations in paragraph 102 of the SAC; and otherwise refers the Court to the referenced publication for a full statement of its contents.

103. SGBL refers the Court to the referenced publication for a full statement of its contents.

104. SGBL denies the allegations in paragraph 104 of the SAC; and otherwise refers the Court to the referenced publication for a full statement of its contents.

105. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 105 of the SAC with respect to accounts at other banks; and is otherwise is constrained by applicable foreign bank secrecy laws from responding to the allegations with respect to accounts allegedly held by it.

106. SGBL denies the allegations in paragraph 106 of the SAC; and otherwise refers the Court to the referenced publication for a full statement of its contents.

107. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 107 of the SAC; and otherwise refers the Court to the referenced publication for a full statement of its contents.

108. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 108 of the SAC.

109. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations with respect to accounts allegedly held by it; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 109 of the SAC particularly given the absence of any definition in the SAC as to the meaning Plaintiffs ascribe to the terms “retained”.

110. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 110 of the SAC; and otherwise refers the Court to the referenced court filings for a full statement of their contents.

111. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 111 of the SAC; and otherwise refers the Court to the referenced designation and publication for a full statement of their contents.

112. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 112 of the SAC; and otherwise refers the Court to the referenced statute for a full statement of its contents.

113. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 113 of the SAC; and otherwise refers the Court to the referenced statutes for a full statement of their contents.

114. SGBL denies the allegations in paragraph 114 of the SAC; and otherwise refers to the statute for a full statement of its contents.

115. SGBL denies the allegations in paragraph 115 of the SAC as it relates to its conduct; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations.

116. SGBL denies the allegations in paragraph 116 of the SAC as it relates to its conduct; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations.

V. JURISDICTION AND VENUE

117. In response to paragraph 117 of the SAC, SGBL refers all questions of law to the Court.

118. In response to paragraph 118 of the SAC, SGBL refers all question of law to the Court.

119. In response to paragraph 119 of the SAC, SGBL refers all question of law to the Court.

120. SGBL denies the allegations in paragraph 120 of the SAC as it relates to its conduct; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations.

VI. THE DEFENDANTS

A. SOCIÉTÉ GÉNÉRALE DE BANQUE AU LIBAN SAL (“SGBL”)

121. SGBL admits the allegations in paragraph 121 of the SAC.

122. SGBL denies the allegations in paragraph 122 of the SAC, stating that its headquarters are located on Riad El Solh Street, Beirut, Lebanon and its head offices are located on the Saloumeh Roundabout, in Dekwaneh, Lebanon.

123. In response to paragraph 123 of the SAC, SGBL refers the Court to the referenced document for a full statement of its contents.

124. In response to paragraph 124 of the SAC, SGBL admits only that Mr. Sehnaoui is Chairman of the SGBL Group, and, as of 2017, held 51.65% of SGBL’s common shares.

125. SGBL admits the allegations in paragraph 125 of the SAC.

126. In response to paragraph 126 of the SAC, SGBL denies the allegations therein except admits that SOCGEN is a shareholder of SGBL.

127. In response to paragraph 127 of the SAC, SGBL refers the Court to the referenced document for a full statement of its contents.

128. In response to paragraph 128 of the SAC, SGBL denies the allegations therein except admits that SOCGEN maintains a branch in New York.

129. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 129 of the SAC and therefore denies same.

130. SGBL denies the allegations of paragraph 130 of the SAC and states that SGBL's Board of Directors created an AML/CFT Committee that reports directly to the Board of Directors.

131. In response to paragraph 131 of the SAC, SGBL admits only that it utilizes technical capabilities to seek to comply with AML/CFT requirements.

132. In response to paragraph 132 of the SAC, SGBL admits only that it maintained U.S. dollar-denominated correspondent accounts at SOCGEN–New York (account number 00150347), The Bank of New York Mellon (account number 8033216603), JP Morgan Chase Bank NA, American Express Bank Ltd. and Standard Chartered Bank.

133. In response to paragraph 133 of the SAC, SGBL admits only that its UID is 001079.

134. In response to paragraph 134 of the SAC, SGBL admits only that its SWIFT code is SGLILBBX.

135. In response to paragraph 135 of the SAC, SGBL admits that it settles foreign exchange transactions through the accounts of settlement members at CLS-New York, and otherwise denies the allegations.

136. In response to paragraph 136 of the SAC, SGBL refers the Court to the referenced document for a full statement of its contents.

137. In response to paragraph 137 of the SAC, SGBL admits that on or about June 22, 2011, it entered into a \$580 million sale and purchase agreement with LCB to acquire certain assets and liabilities of LCB pursuant to Lebanese law.

138. SGBL denies the allegations in paragraph 138 of the SAC.

139. SGBL denies the allegations in paragraph 139 of the SAC.

140. In response to paragraph 140 of the SAC, SGBL denies the allegations therein except admits that on or about September 7, 2011, the Central Council of the Central Bank of Lebanon granted its final approval of SGBL's acquisition of certain assets and liabilities of LCB under Lebanese law.

141. In response to paragraph 141 of the SAC, SGBL refers the Court to the referenced document for a full statement of its contents.

142. SGBL denies the allegations in paragraph 142 of the SAC.

143. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 143 of the SAC and therefore denies same.

144. SGBL denies the allegations in paragraph 144 of the SAC.

B.-M. OTHER BANK DEFENDANTS

145. – 307. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 145 through 307 of the SAC and otherwise refers this Court to referenced documents for their content.

VII. ISLAMIC REVOLUTIONARY GUARD CORPS (IRGC)

308. – 324. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 308 through 324 of the SAC.

VIII. HEZBOLLAH

325. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 325 of the SAC.

326. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 326 of the SAC.

327. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 327 of the SAC.

328. In response to paragraph 328 of the SAC, SGBL refers the Court to the designation and/or publication for their full content.

329. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 329 of the SAC.

330. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 330 of the SAC.

331. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 331 of the SAC.

332. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 332 of the SAC.

333. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 333 of the SAC.

334. In response to paragraph 334 of the SAC, SGBL refers the Court to the designation and/or publication for their full content.

335. In response to paragraph 335 of the SAC, SGBL refers the Court to the designation and/or publication for their full content.

336. In response to paragraph 336 of the SAC, SGBL refers the Court to the designation and/or publication for their full content.

337. – 387. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 337 through 387 of the SAC.

388. In response to paragraph 388 of the SAC, SGBL refers the Court to the designation and/or publication for their full content.

389. In response to paragraph 389 of the SAC, SGBL refers the Court to the designation and/or publication for their full content.

390. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 390 of the SAC, except refers the Court to the referenced designations and/or publication for their full content.

391. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 391 of the SAC, except refers the Court to the referenced designations and/or publication for their full content.

392. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 392 of the SAC, except refers the Court to the referenced designations and/or publication for their full content.

393. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 393 of the SAC, except refers the Court to the referenced designations and/or publication for their full content.

394. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 394 of the SAC.

395. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 395 of the SAC.

396. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 396 of the SAC.

397. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 397 of the SAC.

398. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 398 of the SAC, except refers the Court to the referenced designation for its full content.

399. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 399 of the SAC.

400. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 400 of the SAC, except refers the Court to the referenced designation for its full content.

401. – 416. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 401 through 416 of the SAC.

417. In response to paragraph 417 of the SAC, SGBL refers the Court to the referenced designations and/or press release for their full content.

418. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 418 of the SAC.

419. – 424. In response to paragraphs 419 through 424 of the SAC, SGBL refers the Court to the referenced designations and/or press release for their full content.

425. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 425 of the SAC.

426. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations regarding accounts allegedly held at other banks; and otherwise is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 426 of the SAC.

427. – 431. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 427 through 431 of the SAC.

432. In response to paragraph 432 of the SAC, SGBL refers the Court to the designation for its full content.

433. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 433 of the SAC.

434. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 434 of the SAC.

435. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 435 of the SAC.

436. In response to paragraph 436 of the SAC, SGBL refers the Court to the designation and/or publication for their full content.

437. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 437 of the SAC.

438. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 438 of the SAC.

439. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 439 of the SAC.

440. In response to paragraph 440 of the SAC, SGBL refers the Court to the designations and/or publication for their full content.

441. In response to paragraph 441 of the SAC, SGBL refers the Court to the designations and/or publication for their full content.

442. In response to paragraph 442 of the SAC, SGBL refers the Court to the designations and/or publication for their full content.

443. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 443 of the SAC.

444. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 444 of the SAC.

445. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 445 of the SAC.

446. In response to paragraph 446 of the SAC, SGBL refers the Court to the publication for its full content.

447. – 453. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 447 through 453 of the SAC except refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys and refers the Court to the U.S. referenced designation and/or publication for their full content.

454. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 454 of the SAC except refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

455. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 455 of the SAC except refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

456. – 472. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 456 through 472 of the SAC except refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys and refers the Court to the U.S. referenced designation and/or publication for their full content.

473. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 473 of the SAC.

474. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 474 of the SAC.

475. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 475 of the SAC.

476. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 476 of the SAC.

477. In response to paragraph 477 of the SAC, SGBL refers the Court to the publication for its full content.

478. – 525. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 478 through 525 of the SAC except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

526. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 526 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

527. – 535. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 527 through 535 of the SAC except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to

the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

536. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 536 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

537. – 550. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 537 through 550 of the SAC except refers the Court to statements of the U.S. Treasury for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

551. In response to the allegations in paragraph 551 of the SAC, SGBL refers to the Official Commerce Registry of Lebanon; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, except that it is generally aware that the entity is involved in the referenced business.

552. In response to the allegations in paragraph 552 of the SAC, SGBL refers to the Official Commerce Registry of Lebanon; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, except that it is generally aware that the entity is involved in the referenced business.

553. – 558. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 553 through 558 of the SAC except refers the Court to the U.S. referenced designations and/or publications for their full content, except refers the Court

to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

559. – 571. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 559 through 571 of the SAC.

572. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 572 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

573. – 616. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegation in paragraphs 573 through 616 of the SAC except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

617. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 617 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

618. – 625. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegation in paragraphs 618 through 625 of the SAC except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to

the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

626. – 659. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegation in paragraphs 626 through 659 of the SAC except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

660. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 660 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

661. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 661 of the SAC.

662. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 662 of the SAC.

663. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 663 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

664. – 667. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegation in paragraphs 664 through 667 of the SAC except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to

the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

668. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 668 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

669. – 684. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegation in paragraphs 669 through 684 of the SAC except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

685. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 685 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

686. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 686 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

687. – 789. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegation in paragraphs 687 through 789 of the SAC except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to

the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

790. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 790 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

791. – 794. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegation in paragraphs 791 through 794 of the SAC except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

795. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 795 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

796. – 815. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 796 through 815 of the SAC, except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

816. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 816 of the SAC regarding accounts allegedly held by it and otherwise

denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

817. – 887. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 817 through 887 of the SAC, except refers the Court to the U.S. referenced designations and/or publications for their full content

888. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 888 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

889. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 889 of the SAC.

890. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 890 of the SAC.

891. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 891 of the SAC.

892. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 892 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

893. – 916. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 893 through 916 of the SAC, except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to

the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

917. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 917 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

918. – 930. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 918 through 930 of the SAC, except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

931. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 931 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

932. – 947. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 932 through 947 of the SAC, except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

948. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 948 of the SAC regarding accounts allegedly held by it and otherwise

denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

949. – 959. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 949 through 959 of the SAC, except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

960. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 960 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

961. – 1012. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 961 through 1012 of the SAC, except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

1013. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in the footnote in paragraph 1013 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1014. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1014 of the SAC, except refers the Court to the Official Commerce

Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

1015. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1015 of the SAC, except refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

1016. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1016 of the SAC and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1017. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1017 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1018. – 1023. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1018 through 1023 of the SAC, except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

1024. – 1028. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1024 through 1028 of the SAC.

1029. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraphs 1029 of the SAC regarding accounts allegedly held by it and

otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1030. – 1050. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1030 through 1050 of the SAC, except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

1051. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1051 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1052. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1052 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1053. – 1055. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1053 through 1055 of the SAC, except refers the Court to the U.S. referenced designations and/or publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

1056. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1056 of the SAC regarding accounts allegedly held by it.

1057. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1057 of the SAC.

1058. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1058 of the SAC regarding accounts allegedly held by it.

1059. – 1092. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1059 through 1092 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content.

1093. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1093 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1094. – 1115. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1094 through 1115 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content.

1116. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1116 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1117. SGBL denies the allegations in paragraph 1117 of the SAC and otherwise is constrained by applicable foreign bank secrecy laws from responding to the allegations therein.

1118. – 1124. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1118 through 1124 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content.

1125. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1125 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1126. – 1154. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1126 through 1154 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

1155. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1155 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1156. – 1165. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1156 through 1165 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content.

1166. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1166 of the SAC regarding accounts allegedly held by it and

otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1167. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1167 of the SAC regarding accounts allegedly held by it and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1168. – 1263. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1168 through 1263 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content and refers the Court to the Official Commerce Registry of Lebanon which publicly lists the names of a registered corporation's officers, directors and attorneys.

1264. – 1300. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1264 through 1300 of the SAC, except is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraphs 1266, 1271, 1272, 1273, 1279, and 1284 regarding accounts allegedly held by it.

1301. – 1310. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1301 through 1310 of the SAC, refers the Court to the alleged designations in these paragraphs for their full content, and is otherwise constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraphs 1306 and 1307 regarding accounts allegedly held by it.

IX. DEFENDANTS' MATERIAL SUPPORT TO HEZBOLLAH

A. BANK AL MADINA

1311. – 1349. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1311 through 1349 of the SAC.

B. SOCIÉTÉ GÉNÉRALE DE BANQUE AU LIBAN SAL

1. SGBL'S PREDECESSOR, LCB

1350. In response to paragraph 1350 of the SAC, SGBL admits LCB was a Lebanese commercial bank and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1351. – 1367. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1351 through 1367 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content.

1368. In response to paragraph 1368 of the SAC, SGBL admits only that on or about June 22, 2011, it entered into a \$580 million sale and purchase agreement with LCB to acquire certain assets and liabilities of LCB pursuant to Lebanese law and on September 7, 2011 the Central Council of the Central Bank of Lebanon granted its final approval on the aforesaid acquisition.

1369. SGBL denies the allegations in paragraphs 1369 of the SAC.

a. LCB Participated in Hezbollah's Narcotics Money Laundering

1370. – 1402. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1370 through 1402 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content.

b. LCB Maintained Accounts for Various Hezbollah-Controlled Entities

1403. In response to paragraph 1403 of the SAC, SGBL refers the Court to the referenced publications for its full content.

1404. SGBL states that to the extent paragraph 1404 states an opinion, no response is required; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1404 of the SAC except refers the Court to the referenced publications for its full content.

1405. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1405 of the SAC except refers the Court to the referenced lists for their full content.

1406. In response to paragraph 1406 of the SAC, SGBL refers the Court to the referenced report for its full content.

1407. In response to paragraph 1407 of the SAC, refers the Court to the referenced report and/or lists for their full content.

1408. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1408 of the SAC; refers the Court to the referenced list for its full content; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1409. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1409 of the SAC; refers the Court to the referenced list for its full content; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1410. In response to paragraph 1410 of the SAC, SGBL refers the Court to the referenced lawsuit, testimony and/or audit for its full content and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1411. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1411 of the SAC.

1412. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1412 of the SAC.

1413. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1413 of the SAC and otherwise refers the Court to referenced lawsuit.

1414. SGBL states that to the extent paragraph 1414 states an opinion, no response is required; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1414.

1415. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1415 of the SAC and otherwise refers the Court to the U.S. referenced designations and/or other publications for their full content

1416. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1416 of the SAC and otherwise refers the Court to the U.S. referenced designations and/or other publications for their full content

1417. SGBL denies the allegations in paragraph 1417 of the SAC.

1418. SGBL denies the allegations in paragraph 1418 of the SAC.

1419. SGBL denies the allegations in paragraph 1419 of the SAC.

1420. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1420 of the SAC, particularly given the absence of any definition in the SAC as to the meaning Plaintiffs ascribe to the terms “Hezbollah individuals and entities”.

1421. SGBL denies the allegations in paragraph 1421 of the SAC.

1422. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1422 of the SAC and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1423. – 1426. In response to paragraphs 1423 through 1426, SGBL refers the Court to the U.S. referenced designation for its full content.

1427. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1427 of the SAC.

1428. In response to paragraph 1428, SGBL refers the Court to the U.S. referenced designation for its full content

1429. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1429 of the SAC.

1430. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1430 of the SAC and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1431. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1431 of the SAC

1432. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1432 of the SAC and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1433. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1433 of the SAC and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1434. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1434 of the SAC and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations

1435. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1435 of the SAC.

c. LCB Disregarded Anti-Money Laundering Rules

1436. – 1445. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1436 through 1445 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content.

d. LCB's Gambian Subsidiary, Prime Bank

1446. – 1448. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1446 through 1448 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content.

1449. SGBL denies the allegation in paragraph 1449.

1450. In response to paragraph 1450 of the SAC, SGBL refers the Court to the referenced website for its full content and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

1451. – 1464. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1451 through 1464 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content.

e. **LCB's Subsidiary Société Financière de Banque SARL**

1465. – 1467. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1465 through 1467 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content.

1468. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1468 of the SAC and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations

1469. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1469.

1470. SGBL is constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraph 1470 of the SAC and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

2. SGBL ACQUIRED LCB'S LIABILITIES

1471. In response to paragraph 1471, SGBL refers the Court to the U.S. referenced designation for its full content.

1472. SGBL refers the Court to the referenced publications for its full content and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1472 of the SAC.

1473. SGBL admits that it submitted the highest bid to acquire certain assets and liabilities of LCB pursuant to Lebanese law and otherwise denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1473 of the SAC.

1474. In response to paragraph 1474, SGBL refers the Court to the referenced publication for its full content.

1475. In response to paragraph 1475, SGBL refers the Court to the referenced agreement (of which Plaintiffs only partially attach to the SAC) for its full content.

1476. In response to paragraph 1476, SGBL refers the Court to the referenced document for its full content.

1477. In response to paragraph 1477, SGBL admits that Plaintiffs attach portions of the referenced sale and purchase agreement with LCB.

1478. In response to paragraph 1478, SGBL refers the Court to the referenced sale and purchase agreement for its full content.

1479. SGBL admits that on or about September 7, 2011, the Central Council of the Central Bank of Lebanon granted its final approval of SGBL's acquisition of certain assets and liabilities of LCB under Lebanese law and states that SGBL only finalized the purchase of certain assets and liabilities of LCB after a rigorous filtering process that sought to eliminate any and all questionable accounts.

1480. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 1480.

1481. In response to paragraph 1481 of the SAC, SGBL refers the Court to the referenced complaint for its content.

1482. In response to paragraph 1482 of the SAC, SGBL refers the Court to the referenced documents for their content.

1483. SGBL denies the allegations in paragraph 1483 of the SAC.

1484. In response to paragraph 1484 of the SAC, SGBL refers the Court to the referenced document for its content.

1485. In response to paragraph 1485 of the SAC, SGBL refers all question of law to the Court and otherwise denies the remaining allegations.

1486. In response to paragraph 1486, SGBL refers the Court to the referenced publication for its full content and otherwise denies the remaining allegations.

1487. SGBL denies the allegations in paragraph 1487 of the SAC.

1488. In response to paragraph 1488, SGBL admits it paid a purchase price of \$580 million to acquire certain assets and liabilities of LCB under Lebanese law subject to the final review and approval of the Central Bank of Lebanon and otherwise denies the remaining allegations.

1489. In response to paragraph 1489 of the SAC, SGBL admits it executed a stipulation and order of settlement on or about June 20, 2013, and refers the Court to that document for its content.

1490. SGBL states that to the extent paragraph 1490 states an opinion, no response is required; and otherwise denies the allegations

1491. SGBL states that to the extent paragraph 1491 states an opinion, no response is required; and otherwise denies the allegations

1492. In response to paragraph 1492 of the SAC, SGBL refers the Court to the referenced document for its content.

1493. In response to paragraph 1493 of the SAC, SGBL refers the Court to the referenced document for its content and otherwise denies the allegations in that paragraph.

1494. SGBL denies the allegations in paragraph 1494 of the SAC.

3. SGBL AIDED AND ABETTED AND CONSPIRED WITH HEZBOLLAH

1495. – 1518. In response to paragraph 1495 through 1518 of the SAC, SGBL specifically denies it aided and abetted and/or conspired with Hezbollah; denies it is the legal successor-in-interest to LCB and its criminal conduct; states it is constrained by applicable foreign bank secrecy laws from responding whether it maintains an account for the referenced person or entity; refers the Court to the U.S. referenced designations and/or other publications for their full content; refers the Court to the Official Commerce Registry of Lebanon with respect to the ownership of the referenced entity; and otherwise denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

C.-N. OTHER BANK DEFENDANTS

1519. –1864. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1519 through 1864 of the SAC except refers the Court to the U.S. referenced designations and/or other publications for their full content, and is

otherwise constrained by applicable foreign bank secrecy laws from responding to the allegations in paragraphs 1739, 1768, and 1849.

X. THE IRGC

1865. – 1890. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1865 through 1890 of the SAC.

XI. HEZBOLLAH'S ROLE

1891. – 2001. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 1891 through 2001 of the SAC.

XII. HEZBOLLAH'S AND THE IRGC'S AGENTS

2002. – 2085. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 2002 through 2085 of the SAC.

XIII. THE PLAINTIFFS

2086. – 3497. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 2086 through 3497 of the SAC.

3498. – 5685. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraphs 3498 through 5685 of the SAC.

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

CIVIL LIABILITY UNDER 18 U.S.C. § 2333(a) FOR VIOLATIONS OF 18 U.S.C. § 2339B

CONSTITUTING ACTS OF INTERNATIONAL TERRORISM

5686. – 5696. In response to paragraphs 5686 through 5696 of the SAC, SGBL states that this claim has been dismissed, and that no responsive pleading to it is therefore required.

SECOND CLAIM FOR RELIEF
CIVIL LIABILITY UNDER 18 U.S.C. § 2333(d) FOR AIDING AND ABETTING HEZBOLLAH,
A FOREIGN TERRORIST ORGANIZATION

5697. In response to paragraph 5697 of the SAC, SGBL repeats and re-alleges each and every Answer in the foregoing paragraphs.

5698. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5698 of the SAC.

5699. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5699 of the SAC.

5700. SGBL admits the allegations in paragraph 5700 of the SAC.

5701. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5701 of the SAC.

5702. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5702 of the SAC.

5703. SGBL denies the allegations in paragraph 5703 of the SAC.

5704. SGBL denies the allegations in paragraph 5704 of the SAC.

5705. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5705 of the SAC.

5706. SGBL denies the allegations in paragraph 5706 of the SAC.

5707. SGBL denies the allegations in paragraph 5707 of the SAC.

5708. SGBL denies the allegations in paragraph 5708 of the SAC.

5709. SGBL denies the allegations in paragraph 5709 of the SAC.

5710. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5710 of the SAC.

5711. SGBL denies the allegations in paragraph 5711 of the SAC.

5712. SGBL denies the allegations in paragraph 5712 of the SAC.

THIRD CLAIM FOR RELIEF
CIVIL LIABILITY UNDER 18 U.S.C. § 2333(d) FOR DEFENDANTS' ROLE IN
HEZBOLLAH'S CONSPIRACY TO MURDER AMERICANS IN IRAQ

5713. In response to paragraph 5713 of the SAC, SGBL repeats and re-alleges each and every Answer in the foregoing paragraphs.

5714. SGBL denies knowledge or information sufficient to form a belief as to the truth of the allegations in paragraph 5714 of the SAC.

5715. SGBL denies the allegations in paragraph 5715 of the SAC.

5716. SGBL denies the allegations in paragraph 5716 of the SAC.

5717. SGBL denies the allegations in paragraph 5717 of the SAC.

5718. SGBL denies the allegations in paragraph 5718 of the SAC.

5719. SGBL denies the allegations in paragraph 5719 of the SAC.

5720. SGBL denies the allegations in paragraph 5720 of the SAC.

5721. SGBL denies the allegations in paragraph 5721 of the SAC.

FOURTH CLAIM FOR RELIEF
SUCCESSOR LIABILITY OF SGBL

5722. – 5735. In response to paragraphs 5722 through 5735 of the SAC, SGBL states that this claim has been dismissed, and that no responsive pleading to it is therefore required.

AFFIRMATIVE DEFENSES
FIRST AFFIRMATIVE DEFENSE

1. The SAC fails to state a claim for which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

2. The SAC must be dismissed because the Court lacks personal jurisdiction over SGBL.

THIRD AFFIRMATIVE DEFENSE

3. Plaintiffs' claims are barred, in whole or in part, by Plaintiffs' lack of standing.

FOURTH AFFIRMATIVE DEFENSE

4. Plaintiffs' claims are barred, in whole or in part, by the intervening acts, wrongs, omissions and/or negligence of other individuals and entities.

FIFTH AFFIRMATIVE DEFENSE

5. To the extent that Plaintiffs have suffered damages, any such damages were not caused by the conduct of SGBL, nor were Plaintiffs' alleged injuries a foreseeable consequence of the Bank's conduct.

SIXTH AFFIRMATIVE DEFENSE

6. To the extent that Plaintiffs have already recovered or will from other persons for the injuries alleged by them, they are barred from seeking duplicative recovery from the Bank.

SEVENTH AFFIRMATIVE DEFENSE

7. Plaintiffs' claims are barred by 18 U.S.C. § 2336 because they were injured during the course of an armed conflict between the United States and Iraqi military forces known as the Second Gulf War.

EIGHTH AFFIRMATIVE DEFENSE

8. Plaintiffs' claims are barred, in whole or in part, by the doctrine of laches.

NINTH AFFIRMATIVE DEFENSE

9. Plaintiffs' claims are barred, in whole or in part, by the statute of limitations.

TENTH AFFIRMATIVE DEFENSE

10. SGBL is not liable to the extent that any of its employees or agents acted outside the course and scope of his or her employment/agency. To the extent that any of SGBL's employees or agents engaged in any conduct that violated federal law, which SGBL denies, such actions were outside the scope of his/her/its employment or agency, were contrary to the policies and directives of the SGBL and were not done in furtherance of SGBL's interests.

ELEVENTH AFFIRMATIVE DEFENSE

11. Plaintiffs' claims are barred, in whole or in part, because SGBL did not participate in, authorize, nor ratify the alleged wrongful acts.

ADDITIONAL AFFIRMATIVE DEFENSES

12. Because the SAC is couched in vague and conclusory terms and fails to conform to the pleading requirements of Federal Civil Procedure Rule 8, SGBL cannot presently evaluate all the affirmative defenses that may otherwise be applicable to one or more of the claims alleged therein. SGBL expressly reserves the right to amend this Answer and raise additional Affirmative

Defenses on this basis, and on such basis as may otherwise be established during discovery and by the evidence to be adduced.

13. SGBL also expressly reserves the right to amend this Answer and raise additional Affirmative Defenses in the event any dismissed count or claim in this litigation is reinstated at any time and for any reason.

PRAYER FOR RELIEF

Wherefore, SGBL asks this Court to enter judgment in its favor and against Plaintiffs on all claims asserted in the SAC, dismiss such claims with prejudice, award the Bank its attorneys' fees and costs in this action, and grant the Bank such other and further relief as is just and proper.

Dated: Boston, MA
September 8, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of September 2022, I caused a true and complete copy of Defendant Société Générale De Banque Au Liban SAL's Answer and Affirmative and Other Defenses to the Second Amended Complaint, and this Certificate of Service, to be electronically filed with the Clerk of the Court, United States District Court for the Eastern District of New York and that a copy of the same was served via ECF upon the following:

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